



FINDING OF NO SIGNIFICANT IMPACT (FONSI) For Final Wahweap Development Concept Plan

October 2003



FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Final Wahweap Development Concept Plan Glen Canyon National Recreation Area

The Glen Canyon National Recreation Area (NRA) encompasses more than 1.2 million acres of land and water in northeastern Arizona and southeastern Utah. The principal feature of the area is Lake Powell, which was formed by Glen Canyon Dam on the Colorado River. Glen Canyon NRA was established by enactment of Public Law 92-593 on October 27, 1972. The legislation defines the purposes of the recreation area to include the following: “. . . to provide for public outdoor recreation use and enjoyment . . . and to preserve, scenic, scientific, and historic features contributing to public enjoyment of the area.”

Development Concept Plans (DCP) for the Wahweap district were prepared in 1983 and in 1998. The 1998 plan identified a significant portion of the concepts carried forward in the 2003 DCP update, but changes in NPS policy, combined with unforeseen economic conditions warranted a re-evaluation of the plan and environmental assessment (EA). One key element considered in this update was employee housing. The DCP alternatives evaluated the amount of housing required to meet current and future operational needs and housing availability in the surrounding communities. A fundamental aspect of this analysis was a determination of the amount of on-site housing necessary for employees to perform essential functions within the NRA. The National Park Service Housing Management Handbook (NPS 1997) states: “it is the policy of the Service to provide only the minimum number of housing units necessary to support the mission of the NPS.”

THE PREFERRED ALTERNATIVE (Alt. C)

The preferred alternative would effectively combine elements derived during the scoping process and would accomplish the planning objectives described in the Draft Wahweap Development Concept Plan; Environmental Assessment/Assessment of Effect, (Draft DCP, EA) dated June 2003. A key element of this alternative is a reduced program for concessioner housing which provides for an appropriate level of Category I (first response) and II (temporary/seasonal) employee housing within the park while encouraging other types of concession housing to be provided by local communities. This alternative provides for the elimination of commercial laundry operations from within the park, reduction of dry boat storage spaces, relocation of dry boat storage and construction area from the entrance road view corridor, relocation and screening of the construction staging area, build new food service facility near Stateline launch ramp and/or remodel of existing food service in the Wahweap Lodge, upgrade gravel parking and other existing facilities for improved visitor services, and create a new shuttle system between launch ramps and parking areas to reduce traffic congestion. The preferred alternative is based on a concept of dispersing land use activities between two key activity nodes, the Stateline and Wahweap launch ramps. This concept was first mentioned in the 1983 DCP; however a dispersal of visitors was never fully realized.

Details of the preferred alternative are excerpted below from the Draft DCP, EA. Text changes are incorporated in this table and underlined to include clarifications addressed in the NPS Comment Responses in Attachment A of this document.

PREFERRED ALTERNATIVE ELEMENTS

Element	Preferred Alternative (Alt. C)
Concessioner Housing	<ul style="list-style-type: none"> Remove all mobile homes or trailers Replace existing dorms over time Define development area limits Define minimum and maximum densities Define maximum building height zones Maximum Concession employees to be housed: 175 Seasonal and 30 First Response personnel
Cabins	<ul style="list-style-type: none"> Coordinate with AZ SHPO Maintain structures and district. Stabilize and close up cabins and maintain district in current location and prevent unauthorized access.
Campground	<ul style="list-style-type: none"> Implement total number as in '98 DCP Modification of types of sites and modified footprint. Provide up to 283 sites (191 Hook-up, 59 Non-Hook-up, 18 walk-in tent, 15 group sites)
Launch Ramp Parking	<ul style="list-style-type: none"> Develop up to 365 car/trailer parking in gravel overflow area across from Stateline Launch Ramp Provide shuttle between Stateline and Wahweap launch ramps and parking areas
Visitor Contact Station	<ul style="list-style-type: none"> Expand the building footprint for NPS visitor contact services or renovate existing contact area within the Wahweap District Ranger's Office
Fee Stations	<ul style="list-style-type: none"> Upgrade fee station booths at South and North entrances to include storage, larger booths with upgraded HVAC, shade protection, restrooms and employee break area.
Fire Station	<ul style="list-style-type: none"> Complete construction of new fire station adjacent to District Ranger's Office as described in the '98 DCP.
NPS Maintenance Area	<ul style="list-style-type: none"> Renovate existing fire bay for water lab and storage expansion within existing building footprint Renovate lower warehouse for storage within existing building footprint Provide additional equipment and NPS boat storage within maintenance area boundary
Bicycle Trail	<ul style="list-style-type: none"> Provide bicycle trail from Page to Wahweap.
Recreational Vehicle Park	<ul style="list-style-type: none"> Relocate visitor RV sites to campground area.
Lake Powell Motel	<ul style="list-style-type: none"> Facility is removed. Disturbed areas revegetated with native plants
Wahweap Lodge	<ul style="list-style-type: none"> Wahweap Lodge facilities are expanded for up to 25 additional rooms to <u>replace rooms removed at the Lake Powell Motel</u> <u>Remodel</u> existing meeting room areas Modify parking area to improve drop off and traffic circulation Remodel the existing lodge rooms /buildings that do not meet fire code
Service Station	<ul style="list-style-type: none"> Remodel existing mechanic bays and building within existing footprint for commercial activities such as a convenience store, fuel services will continue Renovate site to accommodate additional visitor facilities such as boat cleaning for exotic species control
Fish Cleaning Station	<ul style="list-style-type: none"> Renovate existing fish cleaning station at or near current location and improve traffic circulation.
Dry Boat Storage	<ul style="list-style-type: none"> Relocate dry boat storage to southwest portion of the boat rental parking adjacent to boat repair. Provide perimeter screening Provide <u>up to a maximum of 450 spaces</u> <u>Incorporate dark sky lighting standards</u>
Construction Area	<ul style="list-style-type: none"> Provide equivalent area for construction activities but relocate to nearby location to improve screening and separate customer, employee and housing circulation. Relocate maintenance building to construction area to improve visual quality and operations. <u>Incorporate dark sky lighting standards</u>
Commercial Laundry Facility	<ul style="list-style-type: none"> Re-locate outside NRA
NPS Storage Yard	<ul style="list-style-type: none"> Area remains at the current location but redesigned within existing boundary for operational efficiency Add perimeter and internal screening
Food Service Facility	<ul style="list-style-type: none"> <u>Remodel</u> food service facilities within the existing Lodge and/or build a new facility near Stateline Launch Ramp
Recycling Transfer Station	<ul style="list-style-type: none"> Provide an outdoor storage and truck loading area for recycling materials collected from within the park near the construction maintenance area
Boat Ramps	<ul style="list-style-type: none"> Complete extension of boat ramps or provide other improvements to support boating use in periods of low

Element	Preferred Alternative (Alt. C)
	<ul style="list-style-type: none"> water. Improve usage of existing parking lots by providing a shuttle between launch ramps and parking areas
Docks	<ul style="list-style-type: none"> Expand capacity of Wahweap fuel docks and replace docks to improve safety and provide secondary containment Upgrade Stateline fuel docks to improve safety and provide secondary containment Provide courtesy docks dedicated to staging for all boats beside Stateline Launch Ramp
Marina	<ul style="list-style-type: none"> Maintain existing authorized slip, end-tie, and buoy numbers. Improve/replace 40 existing overnight (short-term) rental slips (aka "H" dock) at marina Provide 40 new slips for additional overnight short-term rental Provide 20 new slips for administrative and executive services use (non-rental) at marina Provide 20 new slips for (short-term) rental for other commercial services at marina Rehabilitate/expand marina store to include office space and food service facilities Maintain service shop and executive service operation at marina Provide accessible route to marina and fishing dock. Improve usage of existing parking lots by providing a shuttle between launch ramps and parking areas Incorporate dark sky lighting standards
Boat Rentals	<ul style="list-style-type: none"> Maintain houseboat / boat rental numbers totaling 325 vessels (175 houseboats/150 small boats) PWC rentals would be maintained at 35. Incorporate dark sky lighting standards
Tour Boats	<ul style="list-style-type: none"> Reduce previously authorized tour boat fleet from 20 to 12 vessels (allowing a net increase to current fleet (9) of 3 boats) Provide accessible tour boat accommodations Provide a land-based staging area for high water tour boat operations such as a shade shelter with seating
Wastewater Treatment	<ul style="list-style-type: none"> As per the Wahweap Wastewater Management Upgrade/Environmental Assessment (2003), wastewater transferred to Page.
State of Utah	<ul style="list-style-type: none"> State of Utah Parks & Recreation and Division of Wildlife maintain a bunkhouse, office and maintenance buildings. No changes planned in these facilities.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is determined by applying the criteria expressed in the National Environmental Policy Act (NEPA), which is guided by the Council on Environmental Quality (CEQ). CEQ provides direction that "the environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. assure for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choices;
5. achieve a balance between population and resource use that would permit high standards of living and wide sharing of life's amenities; and
6. enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The environmentally preferred alternative is the same as the preferred alternative C. This alternative minimizes environmental impacts, while providing a range of diverse visitor experience opportunities. The preferred alternative would surpass the other alternatives in meeting the full range of environmental policy goals. For example in alternative A (no-action) the existing employee housing does not meet the current NPS housing policy or address impacts created by lack of adequate parking and congestion at Wahweap launch ramp. In alternative B, proposed elements would reduce the some of impacts created by

operational issues but would not meet the mission objectives addressing housing for the temporary seasonal work force or improve layout concerns at the dry boat storage and construction yards to improve visual quality. Therefore alternatives A and B do not fully meet the criteria stated above.

The preferred alternative would provide a high level of protection of natural and cultural resources, while concurrently attaining the widest range of neutral and beneficial uses of the environment without degradation; maintain an environment that supports diversity and variety of individual choices; and integrate resource protection with an appropriate range of visitor use.

ALTERNATIVES CONSIDERED

The no-action alternative (alternative A) represents the current conditions at Wahweap Marina area. This alternative includes existing facilities and only a portion of the facilities approved and constructed under the 1998 Wahweap DCP due to funding and construction limitations. Although this alternative serves as a baseline for alternative comparison it does not fully accomplish the NPS project objectives or NEPA goals. For example, the directives regarding housing have changed and the existing concession employee housing numbers do not reflect the new policy objectives. Congestion and the lack of adequate parking create operational concerns at the Wahweap launch ramp area. Some facilities are not ideally located and thus diminish the visual quality of the area and reduce operational efficiency. The overall result is a mismatch between some existing facilities and NPS objectives, concessioner needs and visitor demands. For these reasons, the no action alternative was not selected.

Alternative B combines compatible elements including the improvement of some existing facilities, relocation or removal of other facilities. Alternative elements would include modifying the layout and reducing the size of concessioner housing; improving the layout of dry boat storage and construction yards to improve visual quality; and providing additional amenities, such as a new visitor contact station and upgraded parking near Stateline Launch Ramp. This alternative complies with guidance as described in the 1997 NPS Housing Management Handbook, but does not address the housing need for the temporary work force at Wahweap. Alternative B does not fully achieve all of the project objectives, and thus was not selected.

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria: Impacts that may be both beneficial and adverse: The beneficial and adverse impacts, both short and long-term of the preferred alternative are described in detail in Chapter 4 of the Draft DCP, EA.

Impacts that may be both beneficial and adverse:

Short-term minor to moderate adverse impacts would result due to increases in construction dust and drainage run-off; soil and vegetation disturbances in construction areas; wildlife habitat alterations in construction areas (which are primarily located along existing roads and existing facilities); reduction of on-site housing for permanent employees requiring relocation to housing outside of the park. Beneficial minor to moderate long term impacts would result due to the restoration of 18 acres of previously disturbed area; improvements to visual quality with the relocation and screening of development from primary view sheds; improved visitor experience due to dispersal of facilities to two activity areas thereby reducing traffic and congestion; elimination of commercial laundry activities.

Degree of effect on public health and safety:

Public health and safety are important considerations in the preferred alternative and will require short-term mitigations to reduce minor to moderate effects. The long term beneficial impacts would result through the dispersal of facilities to the two launch ramps reducing traffic and congestion and increasing operational efficiency and safety and through providing secondary containment and improvements to the fuel docks. Short-term impacts to public health and safety would occur during construction. Construction boundaries and barriers, traffic controls, informational signage and flyers to alert the public of the activity would mitigate these short-term impacts.

Unique characteristics of geographic area such as proximity to historic or cultural resources, prime farmlands, wetlands, wild and scenic rivers, or ecological critical areas:

Known archeological resources would not be directly impacted in the preferred alternative; however two sites are in close proximity to proposed bike trail and the campground development. To mitigate any indirect impacts, new improvements would be adjusted to avoid both sites, and mitigation measures would be carried out in coordination with SHPO. There are no prime farmlands, jurisdictional wetlands, wild and scenic rivers, or ecologically critical areas affected.

Degree to which effects on the quality of the human environment are likely to be controversial:

The preferred alternative's overall effects on the human environment would be beneficial as a result of improving operational efficiencies through the upgrade of existing facilities and appropriate relocation of existing and new facilities. None of the concerns or points raised during the environmental assessment scoping and analysis phases were identified as controversial issues.

As part of the scoping process, the National Park Service contacted potentially interested government agencies, including the Arizona State Historic Preservation Office, the U.S. Fish and Wildlife Service, and affiliated American Indian tribes. Consultation letters and meeting summaries are included in the Final Wahweap Development Concept Plan, Environmental Assessment /Assessment of Effect (Final Wahweap DCP, EA) dated October 2003. The issues and concerns identified as a result of the scoping effort are addressed in the environmental assessment and in the comment response section of this document in Attachment A. Implementing the preferred alternative would be unlikely to generate any effects on the human environment that would be highly controversial.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks:

Risks identified in the preferred alternative relate to public safety during periods of facility construction. Mitigation measures to define construction zones, control traffic, implement worker safety measures, and distribution of visitor information during construction activities would reduce potential adverse effects to public safety. Such measures have been effectively applied in other instances and their effectiveness is widely accepted. Facility construction practices would rely on conventional technologies that have been successfully applied in many park units, public-, and private-sector construction projects throughout the nation. Therefore, there would be no highly uncertain, unique, or unknown risks associated with the preferred alternative.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:

The preferred alternative would best promote the national environmental policy expressed in the National Environmental Policy Act (NEPA) and follow the NPS policy (*NPS Management Policies 2001*) requiring analysis of potential effects to determine whether or not actions would impair park

resources. The preferred alternative neither establishes a National Park Service precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts:

As previously described, impacts from construction and the continued operation of Wahweap Marina would be the dominant aspect of cumulative impacts on the natural environment. The negligible to moderate adverse effects related to the preferred alternative, in conjunction with the long-term beneficial effects realized through implementation would not result in significant adverse or beneficial impacts. The improvement to facilities in the Wahweap development zone would not have a significant cumulative impact on the resources or values of Glen Canyon National Recreation Area.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources:

The preferred alternative would have direct short and long-term negligible to minor beneficial impacts to cultural and historic resources. These impacts would occur as mitigation and stabilization measures are implemented at the Trailer Village cabins and measures are taken to avoid known prehistoric sites during construction. Compliance under Sections 106 and 110 of the National Historic Preservation Act was completed through coordination between with the National Park Service cultural resource specialist at the recreation area and the Arizona State Historic Preservation Officer (AZSHPO) under provisions of the Programmatic Agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers. Through the compliance process, the cabins and two prehistoric sites were determined as eligible for the National Register for Historic Places in concurrence with the AZSHPO referenced in consultation letters dated June 5, 2003 and August 22, 2003, respectively. Specific actions taken to stabilize the cabins would be carried out in coordination with the AZSHPO to mitigate any effect on the resource. The Lake Powell Motel was determined as not eligible for inclusion in the National Register of Historic Places in concurrence with AZSHPO in a letter dated June 30, 2003 consultation letter.

Consultation with affiliated Native American tribes also occurred as part of the environmental assessment between February and April 2003. No ethnographic impacts were identified through this process. A summary of consultation meetings is included Appendix A of the Draft DCP, EA.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat:

The preferred alternative would have potential short-term negligible effects on threatened or endangered species or their designated critical habitats. Consultation with U.S. Fish and Wildlife Service (USFWS) in a letter dated August 6, 2003, recommends that construction phase conservation measures be incorporated into the proposed project (regardless of alternative selected) to protect possible Bald eagles and California condor interactions during construction activities. Consultation with the State of Arizona, Game and Fish Department in a letter dated August 13, 2003, provided a brochure on appropriate mitigation measures for the protection and relocation of Burrowing Owls that may be within the vicinity of the project area. (*Development and Burrowing Owls in Arizona*) The recommendations and contact information will be incorporated and adopted as part of the project construction process.

Whether the action threatens a violation of Federal, state or local environmental protection law:

This action would not violate any federal, state, or local environmental protection laws.

Impairment:

The National Park Service has determined that implementation of the preferred alternative (alternative C) would not constitute an impairment to Glen Canyon National Recreation Area's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the Draft DCP, EA, and the public comments received, relevant scientific studies, and the professional judgment of the decision maker guided by the direction in NPS Management Policies, 2001 and General Management Plan. Although the project would have some adverse impacts, in all cases these adverse impacts would be the result of actions taken to preserve and restore other park resources and values. Overall, the proposed action would result in benefits to park resources and values, including opportunities for their enjoyment.

MITIGATION MEASURES FOR THE PREFERRED ALTERNATIVE

To minimize resource impacts, the following mitigation measures would be followed during implementation of the preferred alternative, and were part of the analyses in the environmental assessment. These actions will lessen the potential for adverse effects of the preferred alternative, and have proven to be very effective in reducing environmental impacts on previous projects.

TABLE 2 – MITIGATION MEASURES

Action	Impact Topic
<u>Construction Projects</u> Contractors would be given orientation concerning proper conduct of operations. This orientation is provided in both written form and verbally at a preconstruction meeting. Orientation topics include: <ul style="list-style-type: none">• Wildlife should not be approached or fed.• Collection of park resources, including plants, animals, and historic or prehistoric materials, is prohibited• Contractor must have a safety policy in place and follow it.• A vehicle fuel leakage and spill plan would be developed and implemented for projects.	Wildlife and Wildlife Soils Vegetation Cultural Resources Public Safety
<u>Limitation of Area Affected</u> The following mitigation measures would be implemented to minimize the area affected by construction activities: <ul style="list-style-type: none">• The staging area for the construction office (a trailer), construction equipment, and material storage would be located in previously disturbed area or within the limits of construction. All staging areas would be returned to pre-construction conditions once construction is complete.• Construction zones would be limited to the minimum area requirements and defined prior to any construction activity all protection measures would be clearly stated in the construction specifications, and workers would be instructed to avoid conducting any operations beyond defined construction zone.	Soils Vegetation
<u>Erosion Prevention</u> To minimize soil erosion, the following mitigation measures would be incorporated into the action alternatives: <ul style="list-style-type: none">• Standard erosion control measures such as silt fences, sand bags, or equivalent control methods would be used to minimize any potential soil erosion during construction.• Construction or maintenance earthwork would incorporate stockpile	Water Quality Soils Vegetation

Action	Impact Topic
<p>stabilization. Contouring and erosion control devices such as rip rap would be incorporated into drainage design to prevent soil erosion.</p> <ul style="list-style-type: none"> Native landscape restoration and plantings would be developed for construction projects by a landscape architect or other qualified individual in coordination with the approved park approved native plant list and seeding specifications. 	
<p>Visual Impacts To minimize visual impacts, mitigation measures would include the following:</p> <ul style="list-style-type: none"> Trench corridors for utilities would be limited as much as possible to a 10-foot wide construction zone. Natural, muted colors would be used to blend structures into the landscape. Building heights would be minimized to protect horizon line and view shed 	Visual Resource
<p>Storm Water Controls To minimize potential impacts to water quality, the following mitigation measures would be incorporated into the action alternatives:</p> <ul style="list-style-type: none"> A storm water pollution prevention plan (SWPPP) would be developed prior to any ground-disturbing activities. All National Pollutant Discharge Elimination System (NPDES) permitting requirements will be met. Standard erosion control measures such as rip rap, detention basins, and pollutant separator devices or equivalent control methods would be used to minimize any potential sediment or pollutants to streams and lakes. 	Water Quality Soils
<p>Special Status Species Protection To protect any unknown or undiscovered threatened, endangered, or special status species, construction contracts would include provisions for the discovery of such. These provisions would require the cessation of construction activities until park staff evaluate the project impact on the discovery and would allow modification of the contract for any protection measures determined necessary to protect the discovery:</p> <p>Specific mitigation measures provided by the U.S. Fish and Wildlife Service for Bald Eagle and California Condors are listed below:</p> <ul style="list-style-type: none"> All on-site personnel would be informed to avoid interacting with condors and immediately contact appropriate NPS, Fish and Wildlife Service, or Peregrine Fund personnel if or when condors occur at the action area. If condors occur in the action area, activities would cease until the bird leaves on its own or until techniques are employed by permitted personnel that result in the condor leaving the area. If condors occur within one mile of the project area, any blasting would be postponed until the condors leave or are hazed by permitted personnel. To prevent water contamination and potential poisoning of condors, a fluid leakage and spill plans would be developed and implemented. The plan would define how each hazardous substance would be treated in case of leakage or spill. Open water sources would be covered when not in use (e.g. 'pumpkin' inflatable water storage tanks) to reduce the likelihood of condors drowning. The construction site would be cleaned up at the end of each day that work is conducted (i.e. trash disposed of, scrap material picked up) to minimize the likelihood of condors visiting the area. NPS would educate visitors to the recreation area to avoid interacting with condors and to immediately inform appropriate personnel when condors occur there. Specific protective measures provided by the Fish and Wildlife Service would be incorporated into contract language that would require the 	T&E Species

Action	Impact Topic
<p>contractor and Park Service personnel to comply with the protective measure proposed.</p> <p>The State of Arizona, Game and Fish Department has recommended the brochure "Development and Burrowing Owls in Arizona" (Arizona Partners in Flight) be consulted in the event that burrowing owls need to be relocated due to construction. Protection and relocation provisions described in the brochure would be included in construction contracts.</p>	
<p>Visitor Impacts The following mitigation measures would be incorporated into the action alternatives to minimize the impacts of construction activities on the visitor experience:</p> <ul style="list-style-type: none"> • The Park may consider restricting construction activities during peak use days such as holidays and some weekends during the busiest times of the year to minimize disruption to visitors. • Traffic in any one direction would not be stopped for more than 15 minutes to minimize disruption to traffic flow. • Unless otherwise approved by the park, operation of heavy construction equipment would be restricted to 6:00 am to 10:00 pm in accordance to established park quiet hours. • Information regarding implementation of this project would be shared with the public upon their entry into the park during construction periods. This may take the form of an informational brochure distributed at fee stations or mailed to reservation-holders, postings on the park's website, and/or other methods. 	Visitor Experience
<p>Air Quality Impacts Air quality impacts of the action alternatives are expected to be temporary and localized. To minimize these impacts, the following actions will be taken:</p> <ul style="list-style-type: none"> • To reduce entrainment of fine particles from hauling material, sufficient freeboard would be maintained and loose material loads (aggregate, soils, etc.) will be tarped. • To reduce tailpipe emissions, construction equipment would not be left idling any longer than is necessary for safety and mechanical reasons. • To reduce construction dust in the short term, water would be applied to problem areas. Equipment would be limited to the defined construction area to minimize soil disturbance and consequent dust generation. • Landscaping and revegetation would control long-term soil dust production. Mulch and the plants themselves would stabilize the soil and reduce wind speed/shear against the ground surface. 	Air Quality

PUBLIC INVOLVEMENT

Public involvement was integrated throughout the planning process. A scoping meeting was held in January 2003 to identify concerns related to the project and to identify the range of issues to be addressed in the environmental analysis. Radio announcements, press releases, website postings, brochure mailings, and a public open house were held to keep the public involved in the planning process. The environmental assessment was made available for an extended public review and comment period July 16 and September 5, 2003. A total of 6 respondents with a total of 22 written comments were received pertaining to the Draft DCP, EA. All comments addressed specific preferences for elements within the range of alternatives. The written comments included 3 citizen responses and a detailed response letter

from the City of Page, Arizona. The remaining 2 letters were from government agencies as part of the consultation process (USFW and AZ Game and Fish Department).

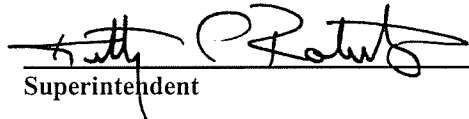
Substantive comments on the environmental assessment centered on four topics: housing, land facilities/actions, affected environment, and miscellaneous. These concerns resulted in no changes to the text of the environmental assessment but are addressed in the comment responses in Attachment A attached to this FONSI. The FONSI and Attachment A will be sent to all commentors.

CONCLUSION

The preferred alternative does not constitute an action that normally requires preparation of an Environmental Impact Statement (EIS). The preferred alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are negligible to moderate. There are no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed or eligible for listing in the National register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, known cumulative effects or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended:


Superintendent

10/29/03
Date

Approved:


Intermountain Regional Director

11/4/03
Date

ATTACHMENT A
NPS Response to Public Comments

Wahweap Development Concept Plan
Environmental Assessment/Assessment of Effect

The environmental assessment was made available for an extended public review and comment period July 16 and September 5, 2003. A total of 6 written responses containing 22 comments were received pertaining to the document. Comments were received by letter, fax, and electronic mail. Of the 6 documents received, 3 were letters from federal, state and local governmental agencies, 1 individual letter, and 2 electronic mail submittals.

Pursuant to the *National Environmental Policy Act* (NEPA), responses were prepared for all substantive comments. *Substantive comments* are comments that raise an issue regarding law or regulation, agency procedure or performance, compliance with stated objectives, validity of impact analysis, or other matters of practical or procedural importance. Substantive comments require a response or a corresponding revision in the final environmental assessment text. *Non-substantive comments* are comments that offer opinions or provide information not directly related to issues or impact analyses. Non-substantive comments are used as background information for the environmental assessment team, but do not require a formal response.

PUBLIC COMMENTS:

ALTERNATIVES

Issue: *Preferred Alternative C*

Q: We had hoped that this Plan would reflect a greater effort by the Service in partnering with the local community to the benefit of all parties. We do not believe that many, if any, of the available cooperative avenues were thoroughly investigated and/or considered before your adoption of Alternative C as "Preferred".

A: The National Park Service(NPS) is committed to the consideration of cooperative opportunities with the City of Page and other local communities, as stated in the Purpose and Need for Action, page 1-5 Objectives; "Integrate existing and proposed services with local economies where appropriate." In addition, the NPS will encourage the concessioner to work with local communities on a variety of issues, such as employee housing and relocation of other facilities or services.

Public Comment: 004 A, B (excerpts from City of Page, Arizona, letter)

Issue: *Alternative A – No Action*

Q: This alternative does not reflect actual implementation of the 1998 Wahweap DCP and misstates current conditions associated with the 1998 DCP. Much of the reason given for another planning effort at Wahweap is not supported by facts or a clear discussion of the alternative itself

(Only a table is provided). A comparison to the 1998 DCP will reveal that much of the NPS Proposed and Preferred Alternatives (95%) are taken directly from the 1998 plan. Those aspects of the 1998 DCP that are no longer applicable or suiting GLCA Management direction and needs should be better addressed and explained in the description of Alternative A.

A: The need for modification to some actions as proposed in the 1998 DCP is presented under section 1.2, Purpose and Need for Action, and specifically at the top of page 1-5, which states that these changes are derived from new initiatives such as new NPS housing policy and recent visitor trends that have occurred within five years since the completion of the 1998 DCP. Section 2.0, Alternatives, further presents the rationale for the development of the no-action alternative which is based on a continuation of current conditions and the on-going implementation of approved actions from the 1998 DCP (expansion of the campground, relocating RV sites, new fire station, and extension of the boat ramps). Planning must remain flexible to adapt to changing conditions, visitor use trends and political influences. The NPS acknowledges that many of the preferred proposals come from the existing 1998 DCP. Text was added to the FONSI and Final Wahweap DCP, EA to further reflect this clarification. In this regard, updates to existing planning documents are both reasonable and practical.

Public Comment: 003 A, B

HOUSING

Issue: *Housing conditions under alternative A – no action*

Q: The 1998 DCP required a reduction of concessioner housing to 25 response positions (one position for one unit), and “up to 200 seasonal employees” for the dorm units. This change in authorized housing was to occur upon completion of the new Wahweap Campground and RV Park and removal of trailers, etc. from the Concessioner housing area. Why isn’t this reflected in existing conditions or in Section 2.7? It appears that the only major difference in the “No action” alternative and the 2003 NPS Preferred Alternative “C” proposed action for housing is the lack of NPS and concessioner implementation of the planned actions in the 1998 DCP.

A: The no-action alternative describes only the current conditions and not the plans outlined in the 1998 DCP. The previous DCP included up to 200 seasonal units, 25 permanent units and 50 seasonal RV hook-up sites. Alternative C only proposes to provide up to a maximum of 175 concession employees and 30 first response employees in on-site housing. Therefore, the preferred alternative substantially reduces the approved number of concession employee housing units within Wahweap. Text was added to the FONSI and Final Wahweap DCP, EA to further clarify this point.

Public Comment: 003 C

Issue: *Employee housing availability in the local area*

Q: The Plan deals only with concessioner housing but we believe it appropriate to also mention National Park Service housing. There is no question that Class I, First Responder, employees should be housed in the area. We see no reason, however, for the Concessioner or Service to provide housing within the Area for an additional 175 Class II employees. We believe that you

are absolutely “right on track” with the statement in the EA under the heading “Socioeconomic”, page 4-39; 4.1.1.5 Alternative C, Impact Analysis, first paragraph, last sentence, which states “The concessioner would also work with the City of Page and willing developers to ensure the availability of housing to meet the housing type and affordability of this new market demand”. The interaction suggested is the first avenue to be explored *before* any other move is made toward moving or expanding employee housing with the Recreation Area.

A: Alternative "C" (preferred) does not propose an additional 175 seasonal employees at Wahweap but limits the number of on-site seasonal employees up to 175 maximum. Currently the concessioner typically houses more than 200 seasonal employees on-site. In addition, full-time employees housed on-site typically exceed the 30 proposed in alternative B and C in the DCP. These proposed numbers represent a net reduction of on-site staff housing and should create a market demand for additional housing in the surrounding communities. The National Park Service will continue to encourage the Concessioner to work with local communities on a variety of issues including employee housing.

Public Comment: 004 C, D, E (excerpts from City of Page, Arizona, letter)

LAND FACILITIES / ACTIONS

Issue: *Bicycle path proposed in alternatives B and C*

Q: The bicycle path or trail from Wahweap area to Page is a great idea. One possible consideration for the route is to use portions of the disturbed area on or adjacent to the proposed sewage line from Wahweap to Page where applicable. Is access for maintenance and repair of sewage lift stations planned for? What is the authorization for the establishment of the bicycle path? A special regulation may be required for authorization of this mountain bike trail system within the national recreation area.

A: The National Park Service agrees that routing the alignment of the proposed bicycle trail along portions of the proposed sanitary sewer pipeline would reduce the need for additional disturbance to adjacent site areas and lessen impacts. Providing a bicycle path could also eliminate the need for service roads along the pipeline. Authorization for providing a bicycle trail from Wahweap to the local community comes from direction provided in the 1979 General Management Plan for Glen canyon NRA. During the DCP public scoping process, members of the public expressed a desire for a trail connection to the local community. No special regulation is required because the proposed action is not to construct mountain bike “trails”, but a hardened surface bike path as a connector for visitors and local residents. The proposal in both alternatives B and C also states that further design and site specific surveys and environmental analysis would be required before implementation could be carried forward. Additional text was added to the Final Wahweap DCP, EA to encourage a cooperative effort between the City of Page and Arizona Department of Transportation to utilize existing road rights-of-way.

Public Comment: 003 F, G, H

Issue: *Lake Powell Motel*

Q: We agree that desirability and use of this facility for public lodging has long since come to an end. We are not certain, however, that the old motel does not have a potential public use as something like a national, regional or local Environmental Education Center. At the local/regional level possible sponsors might include the Page Unified School District, Coconino Community College, Northern Arizona University or Glen Canyon Natural History Association or a combination of these and similar organizations. We'd like to see this or similar ideas explored in depth before the structure is razed. If attempts toward alternative public uses of the facility had been previously explored, that fact should have been cited in the DCP.

A: The National Park Service supports the preferred action of removing Lake Powell Motel and restoring the site with native vegetation. This proposal meets the goal of concentrating specific uses inside the Development Zone of Wahweap such as the consolidation of lodging in one location for operational efficiency. Specific proposals, outside of this comment, have not been brought forward to NPS for evaluation by any governmental or non-profit organization for adaptive use of this facility to date. Implementing the preferred alternative would not prevent proposals from being evaluated for future uses for the site. However, any future development at that site would require a feasibility study and regional assessment of the proposal along with environmental compliance prior to adopting an alternate use for the area.

Public Comment: 004 F, G (excerpts from City of Page, Arizona, letter)

Issue: *Wahweap Lodge convention facilities*

Q: Meeting room expansion for an additional 200 persons in Wahweap Lodge: The provision of Convention facilities is a function that is, we strongly believe, better left to the private sector in adjacent communities. There is no way that we can read the need or even the desirability of a "Convention Facility" into the definition of the purposes of the recreation area as stated in Public Law 92-593, October 27, 1972.

A: The preferred alternative proposes to expand a portion of the main lodge to provide meeting space for a maximum of 200 people. The intent of this element allows for remodeling of existing facilities to make the current meeting space areas more operationally efficient. The meeting room capacity at the lodge currently serves a maximum of 200 people making the expansion a no-net-gain of meeting capacity. Text was added to the FONSI and Final Wahweap DCP, EA to further clarify this point.

Public Comment: 004 H (excerpts from City of Page, Arizona, letter)

Issue: *Dry boat storage*

Q: We believe that the most appropriate location for a dry storage area is on private land outside of the Recreation Area. Ample land resources for boat storage and housing developments exist in Page, AZ and Big Water, UT. If the concession does not presently have 450 storage spaces, the number of existing spaces should be frozen and no more than that number allowed to be developed in the new area. Over time and within the purview of a new concession contract for Wahweap all concession Dry Boat Storage on-site should, we believe, be eliminated.

A: Providing a range of boat storage opportunities including dry storage, slips, and buoy moorage are appropriate visitor service facilities for Wahweap and are consistent with the General Management Plan. Dry boat storage currently exists in the developed area and has a waiting list of potential customers desiring the convenience of on-site storage. The National Park Service does recognize that dry boat storage options exist in the surrounding communities and will continue to limit the amount of dry boat storage to the current level of up to 450 spaces.

Public Comment: 004 I, J (excerpts from City of Page, Arizona, letter)

Issue: *Utah Dept. of Wildlife and Parks building*

Q: The Utah Dept. of Wildlife and Parks building and land use is not addressed in the 2003 DCP. Shouldn't this be addressed in the 2003 Wahweap DCP as a land use in the developed area?

A: There were no issues or requests to modify the existing facility raised during the public scoping process for the 2003 DCP/ EA. The existing facilities including a bunkhouse, maintenance and office buildings which were previously authorized under the 1998 DCP and constructed in 2000, it was therefore not addressed in each alternative. A letter from the State of Utah, Department of Natural Resources and Parks, dated July 8, 2003 confirmed the completion of all planned projects for the site. Text was added to the FONSI and Final Wahweap DCP, EA to further clarify this point.

Public Comment: 003 J

AFFECTED ENVIRONMENT

Threatened, Endangered or Special Concern Species

Issue: *Bald eagle locations*

Q: Page 3-14. The EA mentioned that bald eagles "are known to occasionally frequent the general area as they move between other locations." In addition, consultation on a previous project in the vicinity of this proposed action indicated that bald eagles have been observed feeding at nearby Antelope Island during winter and early spring. We recommend development of a more comprehensive description and evaluation of the bald eagle situation, and that analysis should be included in you biological evaluation or assessment of the proposed action.

A: Bald Eagle surveys have been completed by NPS staff between 1991 and 2002. Specific citations of these surveys were omitted in the environmental assessment but were added to the FONSI and Final Wahweap DCP, EA for clarification. Mitigation measures recommended from the United State Fish and Wildlife Service have been added to the preferred alternative. Refer to FONSI, Table 2, Special Status Species Protection.

Public Comment: 001 A (US Fish and Wildlife Service)

Issue: *California condor mitigation*

Q: Page 3-17. The EA indicated that if California condors are attracted to the construction of Wahweap facilities, the Fish and Wildlife Service would be contacted and appropriate actions would be taken to avoid or minimize effects on the species. Over the course of several consultations, we and the consulting agencies have developed some conservation measures regarding the attraction of condors to human activity. We recommend that several of these measures be incorporated into your proposed action.

A: We concur. Mitigation measures recommended from the United State Fish and Wildlife Service have been added to the preferred alternative to lessen impacts. Refer to the FONSI, Table 2, Special Status Species Protection.

Public Comment: 001 B (US Fish and Wildlife Service)

Issue: *Burrowing owls*

Q: The Department notes that much of the project area is located within a previously disturbed area, and contains habitat of minimal value for wildlife. The Affected Environment section of the DCP notes a pair of burrowing owls within the project vicinity, but does not provide any mitigation measures if they are encountered. For your information, the enclosed brochure provides contact information for the safe removal and relocation of burrowing owls should you encounter any before or during project construction. We recommend that this information be included in the DCP.

A: We concur. Mitigation measures recommended in the State of Arizona, Game and Fish Department and enclosed in the recommended brochure "Development and Burrowing Owls in Arizona" (Arizona Partners in Flight) have been added to the preferred alternative to lessen impacts. Refer to FONSI, Table 2, Special Status Species Protection.

Public Comment: 002 A (Game and Fish Department, State of Arizona)

MISCELLANEOUS TOPICS

General Topics

Issue: *Implementation schedules and costs of alternatives B and C*

Q: Alternatives "B" and "C" have numerous proposed actions that the same actions as those proposed in the 1998 DCP, but not implemented. What is the implementation schedule for the 2003 NPS Preferred Alternative, and how confident is the NPS that these "improvements" will meet planning schedules?

A: As stated in the Purpose and Need section of the environmental assessment, page 1-1, the plan will guide future development for the Wahweap area for the next 10 to 15 years. There are currently no implementation schedules for the elements in the 2003 Wahweap DCP pending the completion of the NEPA process and the award of a new concession contract.

Public Comment: 003 D

Q: Please explain how the costs for each alternative have changed since 1998, and what are the reasons for the differences in the costs of the proposed projects?

A: Costs for the facility improvements proposed in the preferred alternative in the 2003 DCP and the 1998 DCP are a result of better cost data from recently constructed facilities in the area and changes in scope and program of previously proposed elements. In addition, cost differences of proposed elements not yet constructed would also occur due to construction materials cost changes which can range from 3.5% to 4% per year.

Issue: *Visual resources – night sky protection*

Q: What is the progress of protecting night sky issues at Wahweap and Stateline as identified in the 1998 DCP? There are no costs associated with alternatives B and C, as shown in the budget or task list for any of the elements identified as night sky issues (Elements 15, 16, 23, 24, etc.).

A: Park-wide guidelines were established by Glen Canyon NRA in 2001 for the protection of dark/night skies from excessive light pollution. The guidelines propose lighting standard for use in the developed area in the recreation area. Recent and future development projects refer to this guidance when selecting exterior lighting fixtures. Site development estimates, if applicable, include costs for exterior lighting. Text was added to the FONSI and Final Wahweap DCP, EA to reference these guidelines.

Public Comment: 003 I

Issue: *Consultation and coordination – list of preparers*

Q: The NPS planning team, listed on page 156 under List of Preparers, does not show any NPS expertise in Natural Resources (air quality, water quality, wildlife, botany, etc.). Is this an oversight? If not, where did NPS expertise on natural resource impacts come from? Who made the determination of impacts for the NPS for the 2003 DCP effort?

A: The NPS utilized park staff for internal scoping, natural resource guidance and technical review. The names of these preparers were added to the Final Wahweap DCP, EA.

Public Comment: 003 L

Issue: *Bibliography references*

Q: The Reference to the 1998 Wahweap DCP is not correct. The publication was not from the NPS Regional Office Denver, Colorado, but is from Glen Canyon National Recreation Area, BRW and Dames & Moore Contractors. CSA-75, June 1998.

A: This correction has been incorporated in the Final Wahweap DCP, EA.

Public Comment: 003 M

Q: A few of the Public Laws cited [sic] are missing the enactment or passage dates.

A: A search was made for these citations and changes were made where appropriate in the Final Wahweap DCP, EA.

Public Comment: 003N

Q: A couple of the referenced Executive Orders are missing titles or topics which would be helpful to review or to obtain these reference sources.

A: A search was made for these citations and changes were made where appropriate in the Final Wahweap DCP, EA.

Public Comment: 003O